TECH BOX

e. Directional Antenna Relative Field Values: ☐ Not applicable (Nondirectional)

Rotation: _____ ° ☒ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.309	60	0.281	120	0.709	180	0.988	240	0.822	300	0.957
10	0.209	70	0.214	130	0.812	190	0.956	250	0.913	310	0.894
20	0.214	80	0.209	140	0.894	200	0.913	260	0.956	320	0.812
30	0.281	90	0.309	150	0.957	210	0.882	270	0.988	330	0.709
40	0.329	100	0.446	160	0.991	220	0.871	280	0.999	340	0.587
50	0.329	110	0.587	170	0.999	230	0.871	290	0.991	350	0.446
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.**

Exhibit No. --

11. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") ☒ Yes ☐ No

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers. Exhibit No. --

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefor. (Applicable only if **Certification Checklist** Item 3 is answered "No.") Exhibit No. --

13. **Environmental Protection Act. Submit in an Exhibit** the following: Exhibit No. A

a. If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

EXHIBIT A-2

SPECIFIED TECHNICAL FACILITIES

PROPOSED KAZA-DT
CHANNEL 29/47 - AVALON, CALIFORNIA

SMITH AND FISHER

EXHIBIT B-1

ALLOCATION AND INTERFERENCE STUDY

PROPOSED KAZA-DT
CHANNEL 29 - AVALON, CALIFORNIA

The assumed digital facility on Mount Wilson would operate with facilities identical to those of KAZA-TV, except that maximum ERP would be 500 kw.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe" computer program, which has been found generally to mimic the FCC's program. Changes in interference caused by KAZA-DT to other pertinent stations are tabulated in Exhibit B-2.

As indicated, the proposed KAZA-DT facility would not contribute more than two percent DTV interference to the service population of any affected NTSC or DTV station. In addition, this proposal does not result in any NTSC or DTV station receiving more than ten percent total DTV interference to viewers living within its present service area.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

There are certain Class A LPTV stations that require study. For KNET-LP, Channel 25, Los Angles, an interference study shows that no interference would be caused. Regarding KSFV-LP, Channel 26, San Fernando Valley, we find that any interference caused by the proposed facility is completely masked by interference from other sources. Finally, KTSB-LP, Channel 29, Santa Barbara, would receive interference to 0.006 percent of its service population, which rounds to zero. Further, KTSB-LP has submitted an upgrade application on Channel 43, and specifies that channel in its Class A application, suggesting that it intends not to operate on Channel 29.

EXHIBIT B-1

These interference studies employed a signal resolution (cell size) of 2 kilometers, and a profile spacing increment of 1 kilometer, except that for the KBAK and KTSB-LP studies, we employed a cell size of 1 kilometer and a profile spacing increment of 0.1 kilometer. In doing so, we rely on the Commission's August 10, 1998, Public Notice "Additional Applications Processing Guidelines for DTV."

EXHIBIT B-2

DE MINIMIS INTERFERENCE ANALYSIS

PROPOSED KAZA-DT
CHANNEL 29 - AVALON, CALIFORNIA

NTSC FACILITIES

				Interference Losses (Population)								
Call	City of License	Ch.	Grade B Population F(50,50)	NTSC Only	NTSC & DTV Without KAZA-DT	Unmasked DTV	%[1]	NTSC & DTV With KAZA-DT	Unmasked DTV	%[1]	KAZA-DT Contribution	%[2]
KPXN (Lic.)	San Bernardino, CA	30	12,930,072	371,179	1,215,922	844,743	6.5	1,215,922	844,743	6.5	0	0
KPXN(Appl.)	San Bernardino, CA	30	13,801,787	133,314	787,895	654,581	4.7	787,895	654,581	4.7	0	0
KBAK	Bakersfield, CA	29	596,562	0	0	0	0	1,410	1,410	0.2	1,410	0.2
KCET	Los Angeles, CA	28	14,221,036	114,030	375,272	261,242	1.8	408,165	294,135	2.1	32,893	0.3

DTV FACILITIES

				Interference Losses (Population)								
Call	City of License	Ch.	NTSC/DTV[3] Grade B Pop. Longley-Rice	NTSC Only	NTSC & DTV Without KAZA-DT	Unmasked DTV	%[1]	NTSC & DTV With KAZA-DT	Unmasked DTV	%[1]	KAZA-DT Contribution	%[2]
KPBS-DT	San Diego, CA	30	3,019,905	99,928	99,981	53	< 0.1	99,981	53	< 0.1	0	0

[1] Cannot exceed 10%, under FCC *de minimis* interference standards.
[2] Cannot exceed 2%, under FCC *de minimis* interference standards.
[3] Larger of either NTSC Grade B population (with no DTV losses) or DTV Grade B population with all losses.

EXHIBIT C-1

ALLOCATION AND INTERFERENCE STUDY

PROPOSED KAZA-DT
CHANNEL 47 - AVALON, CALIFORNIA

The assumed digital facility on Mount Wilson would operate with facilities identical to those of KAZA-TV, except that maximum ERP would be 500 kw.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe" computer program, which has been found generally to mimic the FCC's program. Changes in interference caused by KAZA-DT to other pertinent stations are tabulated in Exhibit C-2.

As indicated, the proposed KAZA-DT facility would not contribute more than two percent DTV interference to the service population of any affected NTSC or DTV station. In addition, this proposal does not result in any NTSC or DTV station receiving more than ten percent total DTV interference to viewers living within its present service area.

Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

There is one Class A LPTV station that requires study. For KHTV-LP, Channel 48, Inland Empire, we find that any interference caused by the proposed facility is completely masked by interference from other sources. These interference studies employed a signal resolution (cell size) of 2 kilometers, and a profile spacing increment of 1 kilometer.

It is important to note that these studies include the authorized KOCE-DT facility on Mount Wilson, but do not include the KOCE-DT allotment facility. If that facility must be protected under the *de minimis* interference standards, we calculate that the maximum allowable ERP would be 11 kw, which would reduce KATA-DT field strength at all locations in the Los

EXHIBIT C-1

Angeles area by 17 db. Further, as shown in Exhibit C-3, operation with such reduced power would mean that KAZA-DT could not provide predicted 48 dbμ service to Avalon, its community of license.

EXHIBIT C-2

DE MINIMIS INTERFERENCE ANALYSIS

PROPOSED KAZA-DT
CHANNEL 47 - AVALON, CALIFORNIA

NTSC FACILITIES

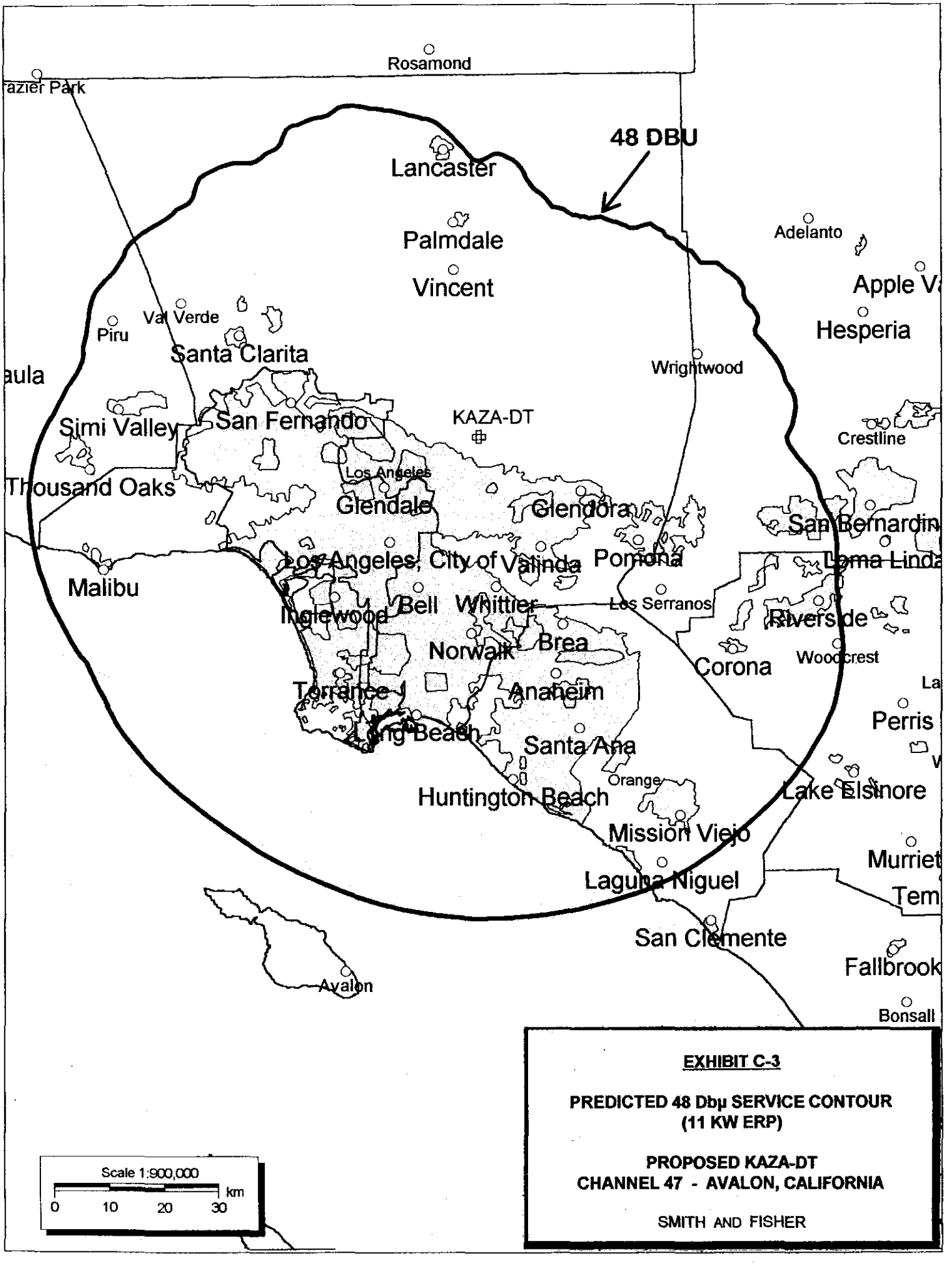
Call	City of License	Ch.	Grade B Population F(50,50)	Interference Losses (Population) NTSC Only	NTSC & DTV Without KAZA-DT	Unmasked DTV	%[1]	NTSC & DTV With KAZA-DT	Unmasked DTV	%[1]	KAZA-DT Contribution	%[2]
KOCE-TV	Huntington Beach, CA	50	9,927,360	386,348	538,368	152,020	1.5	538,368	152,020	1.5	0	0
KFTR(Lic)	Ontario, CA	46	13,428,658	55,480	128,586	73,106	0.5	171,860	116,380	0.9	43,274	0.3
KFTR(Appl.)	Ontario, CA	46	13,860,745	45,135	99,493	54,358	0.4	138,865	93,730	0.7	39,372	0.3
KXLA	Rancho Palos Verdes, CA	44	8,169,489	1,427,476	1,505,477	78,001	1.0	1,505,477	78,001	1.0	0	0

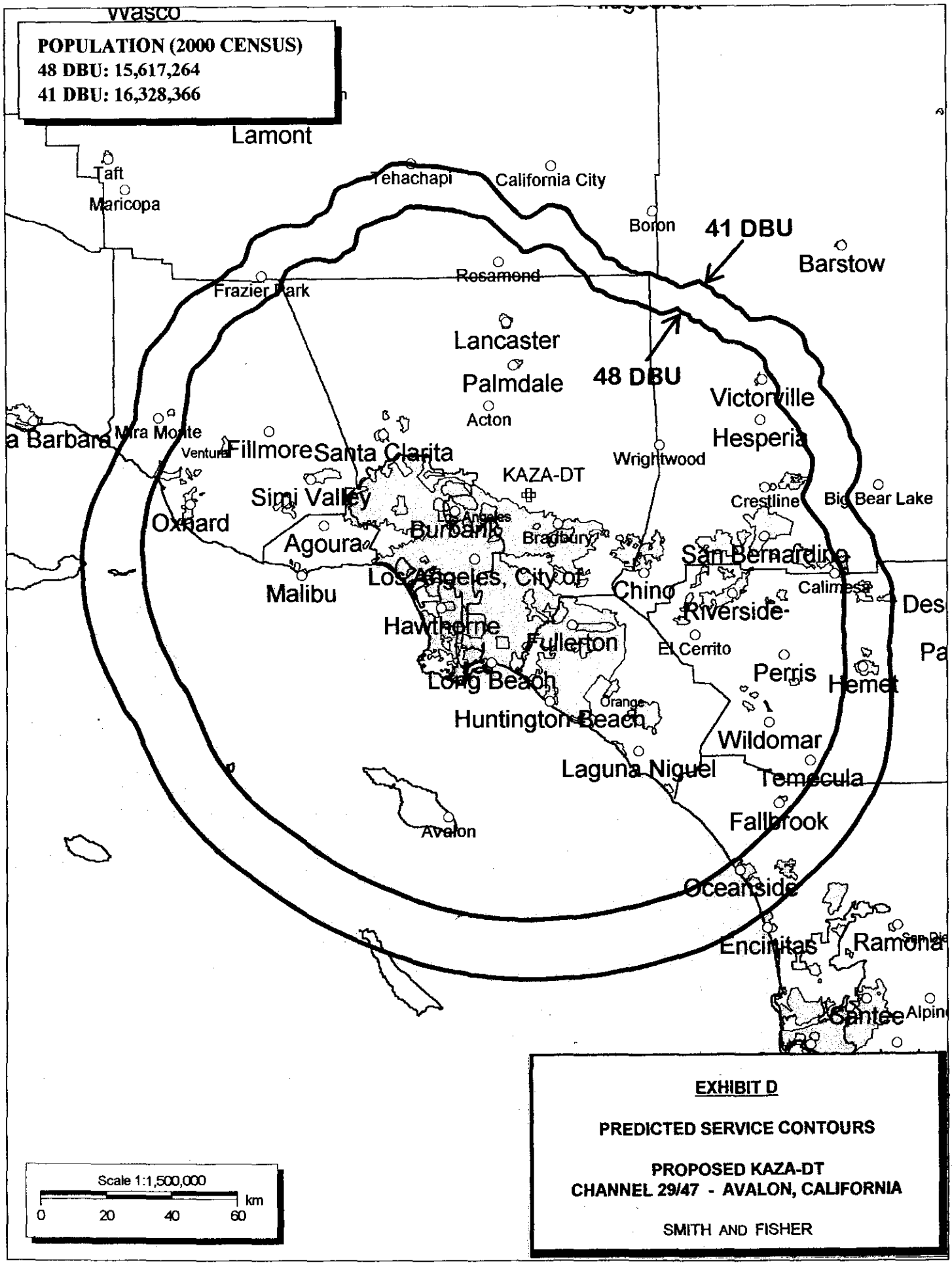
DTV FACILITIES

Call	City of License	Ch.	NTSC/DTV[3] Grade B Pop. Longley-Rice	Interference Losses (Population) NTSC Only	NTSC & DTV Without KAZA-DT	Unmasked DTV	%[1]	NTSC & DTV With KAZA-DT	Unmasked DTV	%[1]	KAZA-DT Contribution	%[2]

- NONE -

[1] Cannot exceed 10%, under FCC *de minimis* interference standards.
[2] Cannot exceed 2%, under FCC *de minimis* interference standards.
[3] Larger of either NTSC Grade B population (with no DTV losses) or DTV Grade B population with all losses.


Rosamond
Fazier Park
48 DBU
Lancaster
Palmdale
Vincent
Adelanto
Apple V
Hesperia
Val Verde
Piru
Santa Clarita
aula
Wrightwood
Simi Valley
San Fernando
KAZA-DT
Crestline
Los Angeles
Thousand Oaks
Glendale
Glendora
San Bernardin
Los Angeles, City of
Valinda
Pomona
Loma Linda
Malibu
Inglewood
Bell
Whittier
Los Serranos
Riverside
Norwalk
Brea
Corona
Woodcrest
Torrance
Anaheim
Perris
Long Beach
Santa Ana
Orange
Huntington Beach
Lake Elsinore
Mission Viejo
Murriet
Laguna Niguel
Tem
San Clemente
Fallbrook
Avalon
Bonsall
Scale 1:900,000
km
0
10
20
30
EXHIBIT C-3
PREDICTED 48 Dbμ SERVICE CONTOUR
(11 KW ERP)
PROPOSED KAZA-DT
CHANNEL 47 - AVALON, CALIFORNIA
SMITH AND FISHER


POPULATION (2000 CENSUS)
48 DBU: 15,617,264
41 DBU: 16,328,366
41 DBU
48 DBU
Lamont
Taft
Maricopa
Tehachapi
California City
Boron
Barstow
Frazier Park
Resamond
Lancaster
Palmdale
Acton
Victorville
Hesperia
Wrightwood
Mira Monte
Ventura
Fillmore
Santa Clarita
KAZA-DT
Simi Valley
Oxnard
Agoura
Malibu
Burbank
Los Angeles
Bradbury
Los Angeles, City of
Crestline
Big Bear Lake
San Bernardino
Chino
Riverside
Calimesa
Hawthorne
Fullerton
El Cerrito
Perris
Hemet
Long Beach
Orange
Huntington Beach
Wildomar
Laguna Niguel
Temecula
Fallbrook
Avalon
Oceanside
Encinitas
Ramona
Santee
Scale 1:1,500,000
km
0
20
40
60
EXHIBIT D
PREDICTED SERVICE CONTOURS
PROPOSED KAZA-DT
CHANNEL 29/47 - AVALON, CALIFORNIA
SMITH AND FISHER

CERTIFICATE OF SERVICE

I, Alicia M. Altamirano, a secretary in the law firm of Paul, Hastings, Janofsky & Walker, LLP, do hereby certify that I have on this 3rd day of July, 2002, caused to be sent by first-class United States mail, postage prepaid, a copy of the foregoing **Petition for Rule Making** to the following:

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